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7	Attorneys for Plaintiff, Deutsche Bank National Trust Company, as Trustee for Morgan Stanley ABS Capital I Inc. Trust 2007-NC1 Mortgage Pass-Through Certificates, Series 2007-NC1				
8	ABS Capital Tinc. Trust 2007-WCT Worlgage Ti	iss-1mrough Certificates, series 2007-1VC1			
9	UNITED STATES	DISTRICT COURT			
	DISTRICT OF NEVADA				
0					
11	DEUTSCHE BANK NATIONAL TRUST	Case No.: 2:20-cv-02146-RFB-VCF			
	COMPANY, AS TRUSTEE FOR MORGAN STANLEY ABS CAPITAL I INC. TRUST				
12	2007-NC1 MORTGAGE PASS-THROUGH	STIPULATION AND ORDER TO			
13	CERTIFICATES, SERIES 2007-NC1,	EXTEND TIME PERIOD TO RESPOND			
	, , , , , , , , , , , , , , , , , , , ,	TO MOTIONS TO DISMISS [ECF Nos.			
14	Plaintiff,	27-29]			
15	VS.				
16	FIDELITY NATIONAL TITLE GROUP,	[First Request]			
	INC.; FIDELITY NATIONAL TITLE				
17	INSURANCE COMPANY; FIDELITY				
18	NATIONAL TITLE AGENCY OF NEVADA,				
.	INC.; DOE INDIVIDUALS I through X; and				
19	ROE CORPORATIONS XI through XX, inclusive,				
20	metusive,				
$_{21}$	Defendants.				
22	Plaintiff, Deutsche Bank National Trust	Company, as Trustee for Morgan Stanley ABS			
23	Capital I Inc. Trust 2007-NC1 Mortgage Pass-Through Certificates, Series 2007-NC1				
24	("Deutsche Bank Trustee"), Specially-Appearing Defendant Fidelity National Title Group, Inc				
25	("Fidelity"), and Defendants Fidelity National Title Insurance Company ("Fidelity National"				
26	and Fidelity National Title Agency of Nevada, Inc. ("Fidelity Agency", collectively				
27	"Defendants"), by and through their counsel of record, hereby stipulate and agree as follows:				
$_{28}$					
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	1		
1		1.	On November 20, 2020, Deutsche Bank Trustee filed its Complaint in Eighth
2			Judicial District Court, Case No. A-20-825215-C [ECF No. 1-1];
3		2.	On November 22, 2020, Fidelity National filed its Petition for Removal to this Court
4			[ECF No. 1];
5		3.	On February 8, 2021, Fidelity National filed a Motion to Dismiss [ECF No. 27];
6		4.	On February 8, 2021, Fidelity Agency also filed a Motion to Dismiss [ECF No. 28];
7		5.	On February 8, 2021, Fidelity also filed a Motion to Dismiss [ECF No. 29];
8		6.	Deutsche Bank Trustee's deadline to respond to Defendants' Motions to Dismiss is
9			currently February 22, 2021;
10		7.	Deutsche Bank Trustee's counsel is requesting an extension until March 24, 2021, to
11			file its response to the pending Motions to Dismiss;
12		8.	This extension is requested to allow Deutsche Bank Trustee additional time to
13			finalize and file its response to the pending Motions to Dismiss as lead handling
14			counsel for Deutsche Bank Trustee continues to recover from an unexpected medical
15			emergency.
16		9.	Counsel for Defendants does not oppose the requested extension;
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1	10. This is the first request for an extension which is made in good faith and not for		
2	purposes of delay.		
3	IT IS SO STIPULATED.		
4	DATED this 22 nd day of February, 2021.	DATED this 22 nd day of February, 2021.	
5	WRIGHT, FINLAY & ZAK, LLP	SINCLAIR BRAUN LLP	
6	/s/ Lindsay D. Robbins Lindsay D. Robbins, Esq. Nevada Bar No. 13474 7785 W. Sahara Ave., Suite 200 Las Vegas, NV 89117 Attorneys for Plaintiff, Deutsche Bank National Trust Company, as Trustee for Morgan Stanley ABS Capital I Inc. Trust 2007-NC1 Mortgage Pass-Through Certificates, Series 2007-NC1 IT IS SO ORDERED. Dated this _24th_ day of February, 202	/s/ Kevin S. Sinclair Kevin S. Sinclair, Esq. Nevada Bar No. 12277 16501 Ventura Boulevard, Suite 400 Encino, California 91436 Attorney for Defendants, Fidelity National Title Group, Inc., Fidelity National Title Insurance Company, and Fidelity National Title Agency of Nevada	
16 17 18 19 20 21 22 23 24 25 26 27 28		RICHARD E BOOLWARE, II United States District Court	